



South Coast Air Quality Management District

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E-Mailed: June 28, 2012
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Ms. Terri Manuel
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Review of the Draft Environmental Impact Report (Draft EIR) for the Arantine Hills Specific Plan Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the AQMD staff recognizes the potential regional air quality benefits from the proposed project that facilitates mixed land uses. However, given the potential health risk impacts from placing sensitive land uses (e.g., residential and park uses) within close proximity to significant emissions sources, such as the 15 Freeway the AQMD staff encourages the lead agency to focus development of these sensitive land uses as far as possible from this source of emissions.

Further, AQMD staff requests that the lead agency clarify how the greenhouse gas (GHG) mitigation measures for the proposed plan will effectively reduce the project's GHG emissions to an insignificant level. Also, the lead agency should consider additional mitigation measures to minimize the project's significant regional construction and operations-related air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any

other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC120515-01
Control Number

Siting Criteria and Performance Standards for Sensitive Land Uses

1. The AQMD staff recognizes that the proposed project may provide regional air quality benefits compared to “traditional” development through a mix of land uses that could reduce the overall vehicle miles traveled (VMT) in the region. However, the AQMD staff is concerned that the proposed project could pose significant health risk impacts to future residents from emissions sources that have not been quantified and disclosed in the Draft EIR. Specifically, the lead agency is proposing residential land uses adjacent to the 15 Freeway which is a prominent source of toxic air contaminants (TACs). Recent research has revealed that pollutants found in close proximity to freeways are associated with a variety of adverse health effects, independent of regional air quality impacts¹. These can include reduced lung capacity and growth²; cardiopulmonary disease³; increased incidence of low birth weight, premature birth, and birth defects⁴; and exacerbation of asthma⁵.

In figure 3.3 of the Draft EIR the lead agency indicates that the specific plan would allow new high density residential units to be placed adjacent to the I-15 Freeway that carries over 150,000 vehicles per day. As a result, the AQMD staff recommends that the lead agency minimize TAC exposure to the project’s sensitive land uses by providing the buffers recommended in the CARB Handbook⁶. Also, if buffer zones are found to be infeasible, AQMD staff recommends that the lead agency quantify the potential severity of this health impact with a health risk assessment prior to approving the project. Should risks exceed AQMD significance thresholds, potential additional measures to consider are included in the Program EIR Appendix G (e.g., AQ-19) for the recently adopted RTP.

Greenhouse Gas Emissions Analysis

2. The Draft EIR utilizes draft thresholds presented by AQMD staff to determine potential significance of GHG impacts. The threshold used was chosen from the AQMD proposed tiered system (Tier 4) and is based on an efficiency target of 6.6 MT CO₂e/year per service population (residents + employees) in the year 2020. This draft AQMD threshold is partially based upon SB 375 targets. As such, there are two efficiency targets in the AQMD draft thresholds, one each for 2020 and 2035. The 2035 draft threshold is 4.1 MT CO₂e/year per service population. While the draft AQMD threshold has not been presented to the AQMD Board for approval, AQMD

¹ “Special Report 17. Traffic-related air pollution: A critical review of the literature on emissions, exposure, and health effects”. Health Effects Institute, May 2009; 394 p.

² “Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study”. Gauderman WJ et al., Lancet, February 2007; 369 (9561): 571-7.

³ “Exposure to traffic and the onset of myocardial infarction”. Peters A et al., The New England Journal of Medicine, 351(17):1721-1730

⁴ Ritz B, et al. 2002 Ambient air pollution and risk of birth defects in Southern California. Am J Epidemiology, 155:17-25

⁵ McConnell R, et al. 2006. Traffic, susceptibility, and childhood asthma. Environ Health Perspectives 114(5):766-72

⁶ California Air Resources Board. April 2005. “Air Quality and Land Use Handbook: A Community Health Perspective.” Accessed at:<http://www.arb.ca.gov/ch/landuse.htm>

staff recommends that the lead agency consider the entire draft threshold, or provide substantial evidence for utilizing only a portion of it.

Construction Equipment Mitigation Measures

3. The lead agency determined that the proposed project will exceed the CEQA regional construction significance thresholds for NO_x; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.
 - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements,
 - Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles) have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Operational Mitigation Measures

4. Given that the lead agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO_x, VOC, PM₁₀, PM_{2.5} and CO the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Transportation

- Require electric car charging stations for non-residential land uses. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- Provide electric car charging infrastructure for multi-family residential land uses.
- Provide incentives to encourage public transportation and carpooling, such as park and ride lots, or dedicated shuttle service from the development to nearby transit for commuters.
- Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices, and/or other incentives.
- Implement a rideshare program for employees.
- Require the use of 2010 diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) upon project build-out.
- Provide an alternative fueling station for delivery trucks (e.g., natural gas or electric).
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- Require the use of electric or alternative fueled maintenance vehicles.

Other

- Provide outlets for electric and propane barbecues in residential areas.
- Require use of electric lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Require use of water-based or low VOC cleaning products.